

1 ROBERT ATKINS (Admitted *Pro Hac Vice*)
ratkins@paulweiss.com
2 JACQUELINE P. RUBIN (Admitted *Pro Hac Vice*)
jrubin@paulweiss.com
3 CAITLIN E. GRUSAUSKAS (Admitted *Pro Hac Vice*)
cgrusauskas@paulweiss.com
4 ANDREA M. KELLER (Admitted *Pro Hac Vice*)
akeller@paulweiss.com
5 **PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
6 1285 Avenue of the Americas
New York, NY 10019
7 Telephone: (212) 373-3000

8 RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
9 MARC PRICE WOLF (SBN: 254495)
mpricewolf@paulweiss.com
10 **PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
11 535 Mission Street, 25th Floor
San Francisco, CA 94105
12 Telephone: (628) 432-5100

13 *Attorneys for Defendants*
UBER TECHNOLOGIES, INC.,
14 RASIER, LLC, and RASIER-CA, LLC

15 *[Additional Counsel Listed on Following Page]*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**
19

20 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
21 LITIGATION

22
23 This Document Relates to:
24 ALL MATTERS
25
26
27
28

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF RANDALL S. LUSKEY IN
SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 KYLE SMITH (Admitted *Pro Hac Vice*)
ksmith@paulweiss.com
2 JESSICA PHILLIPS (Admitted *Pro Hac Vice*)
jphillips@paulweiss.com
3 **PAUL, WEISS, RIFKIND, WHARTON**
& GARRISON LLP
4 2001 K Street, NW
Washington, D.C. 20006
5 Telephone: (202) 223-7300

6 *Attorneys for Defendants*
7 UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF RANDALL S. LUSKEY

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively “Uber”). I am a member in good standing of the Bar of the State of California. I know the following facts to be true of my own knowledge except those matters stated to be based on information and belief.

2. I respectfully submit this declaration in support of Uber’s Administrative Motion to Seal, dated March 20, 2025.

3. I have reviewed the exhibits to my declaration in support of Uber’s Reply on its Motion for a Protective Order, dated March 20, 2025.

4. Exhibit 1 is an email communication concerning a non-final draft communication that was produced in this litigation and in *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”) on a “Confidential” basis. The metadata coversheet and emails include personal identifying information, namely non-public email addresses of Uber employees.

5. Exhibit 2 consists of excerpts of the certified transcript of the November 19, 2024 Deposition of Roger Kaiser taken in the JCCP, which have been designated “Confidential” pursuant to the protective orders entered in this litigation and the JCCP. These excerpts were also filed under seal in the JCCP.

6. Exhibits 3 through 15 consist of metadata cover sheets for certain documents filed as exhibits in support of Plaintiffs’ opposition to Uber’s Motion for a Protective Order. The metadata coversheets include personal identifying information, namely non-public email addresses of Uber employees.

7. Exhibits 16 and 17 are metadata cover sheets for documents produced in this litigation on a “Confidential” basis. The metadata cover sheets include personal identifying information, namely non-public email addresses of Uber employees.

